

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

**In Re: Andrea Hobson Mason
(Debtor)**

**Chapter 13
Case No. 15-60472**

NOTICE OF HEARING

Please take notice that Counsel for the above-named Debtor filed a Motion to Sell Real Estate Free and Clear of Liens, a true copy of which is attached hereto, and shall submit the same to the Court for approval on March 28, 2019 at 9:30 a.m., or as soon thereafter as the parties may be heard, at the United States Bankruptcy Court, 2nd Floor, 1101 Court Street, Lynchburg, Virginia 24501.

Objections to the Motion to Sell Real Estate Free and Clear of Liens must be submitted in writing **no later than March 22, 2019**. In the event that no objections are filed, an order granting the motion may be entered prior to the hearing date.

/s/ Margaret C. Valois
Counsel for Debtor

Margaret C. Valois/VSB #66034
James River Legal Associates
7601 Timberlake Road
Lynchburg, VA 24502
(434) 845-4529
mv@vbclegal.com

CERTIFICATE

I hereby certify that a true copy of the aforesaid Notice and Motion was mailed by first class mail or electronically transmitted to the Chapter 13 Trustee, the Debtor, mortgage lender U.S. Bank National Association, in accordance with FRBP 7004, and all other creditors and other parties of interest.

March 1, 2019

/s/ Margaret C. Valois

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
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**In Re: Andrea Hobson Mason
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**Chapter 13
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MOTION TO SELL REAL ESTATE FREE AND CLEAR OF LIENS

COME NOW **Andrea Hobson Mason**, Debtor, and move the Court for authority to sell real property free and clear of liens and in support thereof state to the Court as follows:

1. Debtor filed a Chapter 13 bankruptcy proceeding in this Court on March 16, 2015;
2. That Debtor Zachary Lee Mason is deceased;
3. As of the present time, the Debtor is not in default in her proposed plan payments;
4. That the Debtor owns certain real property located at 93 Oak Trail, Lynchburg, VA 24502-3082;
5. That the property is encumbered by a First Deed of Trust to US Bank Home Mortgage, said lien having a current balance of approximately **\$118,354.27** (See Exhibit A);
6. That the said real estate has been assessed by the County of Campbell at a value of **\$168,200.00** for tax year 2019 (See Exhibit B);
7. That the Debtor desires to sell said real estate and expects to market the property at a price of **\$194,900.00**;
8. The Debtor has no offers to purchase the property at this time;
9. That the Deed of Trust will be satisfied in full;
10. That the Debtor anticipates that her portion of the net proceeds of the sale will be approximately **\$64,000.00**;
11. The Debtor anticipates receiving sufficient funds to pay off her case. The current base balance is **\$15,019.45**.

WHEREFORE, the Debtor prays that this Honorable Court grant her application and allow her to sell the heretofore described real property and that net proceeds from the sale, in an amount sufficient to pay the Chapter 13 plan in full, or as otherwise required by the Chapter 13 Trustee, be paid to the Chapter 13 Trustee and that Debtor has such other and further relief as is just and proper.

Date: March 1, 2019

ANDREA HOBSON MASON

/s/ Margaret C. Valois

Counsel for Debtor

Margaret C. Valois/VSB #66034

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